



**NEW YORK CITY HOUSING AUTHORITY  
LAW DEPARTMENT**  
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May 19, 2020

*Via ECF*

The Honorable Judge Vernon S. Broderick  
United States District Court  
Southern District of New York  
40 Foley Square, Room 415  
New York, New York 10007

Re: *Colon v. The City of New York, et al.*, No. 16-CV-4540  
*Williams v. The City of New York, et al.*, No. 16-CV-8193

Dear Judge Broderick:

I am counsel for Defendants New York City Housing Authority ("NYCHA"), Michael Kelly, and Brian Clarke (collectively, "the NYCHA Defendants") in the above-referenced matters, which have been consolidated for pre-trial purposes.

Summary judgment briefing in these matters was fully submitted on May 15, 2020. The parties write jointly in reference to Rules 4.D and E of the Court's Individual Rules & Practices, which require the parties to provide the Court with electronic, text-searchable copies of all transcripts on a CD and with paper courtesy copies of all motion papers. However, providing the Court with these materials at this time does not appear to be possible in light of the Covid-19 emergency and the closure of the Southern District Courthouse and counsel's offices.

Accordingly, counsel respectfully propose that they wait until the re-opening of the Southern District Courthouse and their offices to mail the Court the summary judgment courtesy copies and the CDs containing the transcripts. If the Court wishes, the parties can email the Court text-searchable copies of all transcripts at this time.

Respectfully submitted,

*/s/ Jane E. Lippman*

cc: Marcel Florestal, Esq. (via ECF)  
Natalie Marcus, Esq. (via ECF)